

EXHIBIT E

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION,

Case No. 19-md-02913-WHO

**[PROPOSED] SCHEDULING ORDER
PURSUANT TO CMO NOS. 17 AND 19**

This Document Relates to:

[To Be Determined Plaintiff] v. *Juul Labs, Inc., et al*, [Insert Case No.]

Having reviewed and considered the Parties' Proposed Scheduling Order and pursuant to Section VIII.B of this Court's Case Management Order Nos. 17 and 19, the Court hereby enters the following case schedule:

Event/Deadline	Date/Deadline
Deadline for Plaintiff to File Long Form Complaint	June 3, 2024
Deadline for Defendant to File Rule 12 Motions for Plaintiff's Long Form Complaint	July 12, 2024
Deadline for Plaintiff to Respond to Rule 12 Motions	August 9, 2024
Deadline for Defendants to Submit Reply Briefs in Support of Rule 12 Motions	August 30, 2024
Deadline for Defendants to Submit Answer To Long Form Complaint in Event of Denial of Rule 12 Motion	30 days after any order denying a Rule 12 motion
Deadline to Conduct Additional Discovery ¹	November 4, 2024

¹ Pursuant to CMO No. 17 § VIII.B and CMO 19 § VIII, during "Additional Discovery," the Parties may "(a) take the depositions of the Plaintiff, the Plaintiff's spouse, if applicable, and any other non-party lay fact witness specific to the Plaintiff for up to seven (7) hours each, with Counsel for the Settling Defendants questioning first at each deposition; and (b) take the depositions of no more than three (3) of a Personal Injury Plaintiff's treating healthcare providers, with Counsel for the Settling Defendants questioning first at each deposition." For complex medical cases, "Settling Defendants may be permitted to take additional depositions upon a showing of good cause...[but]...[n]o other depositions may be taken during the expedited discovery period absent prior leave granted by the Court upon a showing of good cause."

1	Deadline to Submit Summary Judgment/ <i>Daubert</i> Motions	December 20, 2024
2	Deadline to Submit Response to Summary Judgment/ <i>Daubert</i> Motions	January 20, 2025
3	Deadline to Submit Reply to Summary Judgment/ <i>Daubert</i> Motions	February 18, 2025

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5 Upon the conclusion of this case schedule and pursuant to Section VIII.B of this Court's Case
6 Management Order Nos. 17 and 19, this Court will set a Case Management Conference to
7 determine any non-duplicative discovery including additional expert disclosures are necessary and
8 to discuss other case management issues.

9 IT IS SO ORDERED.

10 Dated: _____, 2024

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12
13 The Honorable William H. Orrick
United States District Judge

28 Should Plaintiff serve written discovery upon the Settling Defendants, "the Parties shall meet and confer about an appropriate deadline for responding to such discovery, which deadline shall be at least sixty (60) days after service of such discovery."